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July 10, 2023

Via ECF

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square, Courtroom 518
New York, New York 10007

**Re: *Sjunde AP-Fonden v. The Goldman Sachs Group, Inc., et al.*,
No. 18-cv-12084 (VSB) (KHP)**

Dear Judge Broderick:

We are writing on behalf of the parties in this matter regarding the post-discovery conference currently scheduled to take place before Your Honor on July 28, 2023.

On September 27, 2021, the Court entered a Case Management Plan and Scheduling Order, which, among other things, scheduled the July 28, 2023 conference to occur after the parties completed expert discovery. (Dkt. No. 131.) The Case Management Plan also requires that the parties, no less than two weeks before the

APPLICATION GRANTED
SO ORDERED *Vern Bro*
VERNON S. BRODERICK
U.S.D.J. 7/11/2023

The post-discovery conference scheduled for July 28, 2023, is hereby adjourned. Within one week of the resolution of the motions identified in this letter, the parties shall submit a joint letter proposing next steps for the adjudication of this case.

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conference, submit a joint letter updating the Court on the status of the case, including whether any party intends to file a dispositive motion.

As the Court is aware, on January 13, 2023, after the parties completed fact discovery, Lead Plaintiff moved for leave to file a third amended complaint and to modify its proposed class. (Dkt. Nos. 209, 213.) On February 16, 2023, the Court stayed expert discovery pending resolution of Lead Plaintiff's motion to amend and ordered resolution of the motion to modify the proposed class to be held in abeyance pending resolution of the motion to amend. (Dkt. No. 224.) The motion to amend and the motion to modify the proposed class are both pending.

On May 24, 2023, during the pendency of the motion to amend and the motion to modify the proposed class, and with the expert discovery stay still in effect, the Court referred all pretrial matters to Magistrate Judge Katharine H. Parker. (Dkt. No. 232.) Judge Parker held a conference just over a week ago, on June 29, 2023. (Dkt. No. 245.) Judge Parker has also scheduled a hearing for July 24, 2023, and has indicated that she will at that time hear oral argument on Lead Plaintiff's motions to amend the complaint and to modify the class period. (Dkt. No. 248.)

The parties are of course prepared to appear before Your Honor on July 28 as scheduled to discuss any matters of interest to the Court. But, given the circumstances described above, including the fact that Judge Parker will in just a few weeks be hearing argument on the pending motions, the parties respectfully request that the July 28 conference before Your Honor be adjourned without date, to be rescheduled following resolution of the motion to amend and the completion of expert discovery.

Respectfully submitted,

/s/ Robert Y. Sperling

Robert Y. Sperling